

Ashton Zylstra

From: Cary Hansel
Sent: Friday, October 25, 2019 4:05 PM
To: Ashton Zylstra
Subject: FW: Hulbert v Sgt. Pope, et al.

From: Cary Hansel
Sent: Thursday, October 17, 2019 1:58 PM
To: John Fredrickson -DGS- <john.fredrickson@maryland.gov>
Subject: Re: Hulbert v Sgt. Pope, et al.

I agreed, without waiver or limitation, that providing each of these individuals plus the Governor and Lt. Governor with the 8 point list of requested items included in the subpoena and producing what they had was a necessary first step. Depending on what that elicits, there may be additional steps required, but we can address that issue if and when the need arises.

Best regards,

Cary

----- Original message -----

From: John Fredrickson -DGS- <john.fredrickson@maryland.gov>
Date: 10/17/19 1:04 PM (GMT-05:00)
To: Cary Hansel <Cary@hansellaw.com>
Cc: Robert McFarland -DGS- <robert.mcfarland@maryland.gov>
Subject: Hulbert v Sgt. Pope, et al.

Cary: Pursuant to our discussion concerning your Notice of Subpoena Duces Tecum to the State, we agreed that in addition to the documents already produced, that I would conduct a reasonable search for additional responsive documents by making inquiry to the addressees listed in email from Chief Wilson. By my review, those individuals are:

1. Secretary Churchill
2. Nelson Reichart
3. Major Todd May
4. Capt. Rebecca Labs
5. Sgt. Dennis Donaldson
6. Deputy Chief Terry Custer
7. George White

Exhibit G

8. Jeffrey Ferreira
9. Nick Cavey
10. Therese Yewell
11. Del. Sid Saab
12. Ellen Robertson
13. Eric Yealdhall
14. Walter Landon
15. Del. Eric Bromwell

Please confirm this list and our understanding as to the State's remaining document production.

As for the MCP directives, I have attached them in pdf. I will forward a bates paginated document tomorrow.

Best,

John C. Fredrickson
Assistant Attorney General
Maryland Department of General Services
300 W. Preston Street, Room 608
Baltimore, Maryland 21201
Telephone Number: (410) 767-1825